



# **Team Radford Semi-Annual Community Meeting**

10 December 2014

7:00-8:00 pm

New River Valley Business Center

**BAE SYSTEMS**





# AGENDA



- Introductions
- Purpose of Meeting
- What Environmental Stewardship Means to Us
- Transparency
- Permit Applications
- Your Questions

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# INTRODUCTIONS



## **US Army (USA)**

### **LTC Luis A. Ortiz**

Commander, USA  
Radford Army Ammunition Plant  
(RFAAP)

### **Rob Davie**

### **Charlie Saks**

## **BAE Systems**

### **Jay Stewart**

### **Alicia Gray**

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# PURPOSE OF MEETING



- **Community Engagement**
  - This forum was requested by you
  - Held twice yearly above and beyond any forums required by regulation or permit process
  - Continue to improve based on your feedback
- **Transparency**
  - Our information is public
  - We want to have a two-way dialog with our community
- **Your Voice**
  - This gives us the opportunity to hear what is important to you
  - We want to share what, why and how we execute our mission of environmental stewardship beyond regulatory reports

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# Environmental Stewardship



**Built in 1941 to protect our nation, still proudly providing energetic material today**

**Key to success: training and ownership**

**We are committed to continuous improvement**

Protect this capability for our future troops and allies

Protect this resource for our children

Community engagement and transparency

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# Transparency



- **We Perform Extensive Environmental Testing**

- We use sophisticated monitoring equipment that continuously monitors our water and air discharges
- We perform annual soil sampling and quarterly groundwater sampling.
- We sample beyond our permit requirements and report those results

- **Our Information Is Public**

- Regulated and inspected by Virginia Department of Environmental Quality (VA DEQ) and (Environmental Protection Agency) EPA
  - Air Quality Section of VADEQ inspected 4 times
  - Solid Waste Section of VADEQ inspected 2 times Solid Waste Permit (SWP) 433 and 353
  - Virginia Department of Health inspected water filtration facilities 2 times
  - EPA inspection in FEB 14 for 8 full days

**BAE SYSTEMS** Our monitoring data is reported to VADEQ and is publicly available

- We self report upset conditions to both VADEQ and EPA





# Transparency



## **We go beyond our legal requirements**

- International Standards Organization 14001:2004 certified
  - Internationally recognized standard of exemplary environmental management
  - Surveillance Audit conducted in August 2014
  - Recertification Audit scheduled for February 2015
- Conducted 13 Internal Audits
- We execute Daily Inspections for Storm Water, Wastewater, and Hazardous Waste Storage Areas
- We shut down processes based on environmental factors. We do this based on our monitoring and training to prevent problems before they occur.

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# NOV



**Notice of Violation (NOV):** Opacity from Powerhouse  
During the period from 1 January 2014 to 31 March 2014, continuous emission monitors at the Powerhouse recorded emissions greater than 20% opacity for more than one six minute period in an hour including opacity greater than 60% during multiple six minute periods. On 6 February 2014 the opacity monitor recorded a maximum six minute period opacity of 88.8%.

The exceedance was caused by a high steam demand in response to the record cold weather in February 2014. NOV AWCRO#8959 was issued by the DEQ on 6 June 2014. Shutting down production did not alleviate the stress on the power plant. The DEQ fined BAE Systems \$37,925 for the permit exceedances.

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# Solution to NOV



## Construct a New Natural Gas Energy Center

- We expended over \$40M on improvements to the existing powerhouse. Those improvements have yielded excellent results and better monitoring.
- Despite the improvements, our existing power house must be replaced to provide reliable energy and reduce emissions for the long term.
- Over \$100M is committed to this project
- VADEQ has issued the required air permit and we have completed the public National Environmental Policy Act process. We are finalizing the design and expect to award a construction contract in 2015.
- In the interim period before the new energy center is constructed, we have committed additional funds and effort toward implementing additional measures to improve the existing coal plant.

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# NOV



**Notice of Violation:** Biological Oxygen Demand (BOD) / Chemical Oxygen Demand (COD) and Failed Toxicity Test in our wastewater system.

Occurred in February 2014 due to high water flow caused by freeze protection water combined with very low temperatures in the treatment basins. Wastewater tests indicated an exceedance of BOD and COD from Outfall 029 into the New River. This means that our treatment plant was not operating at optimal efficiency in the cold weather. A subsequent toxicity test conducted in April 2014 failed toxicity testing requirements. The toxicity test is a very sensitive biologically based lab test designed to detect a change in conditions within the flow. Our voluntary internal testing as well as additional testing discussed with DEQ did not reveal of a root cause for the failed test.

We met with the DEQ in August 2014 and shared the following slide. **SYSTEMS** Since the failed test in April 2014, two toxicity tests have been conducted and the wastewater discharge passed both tests.

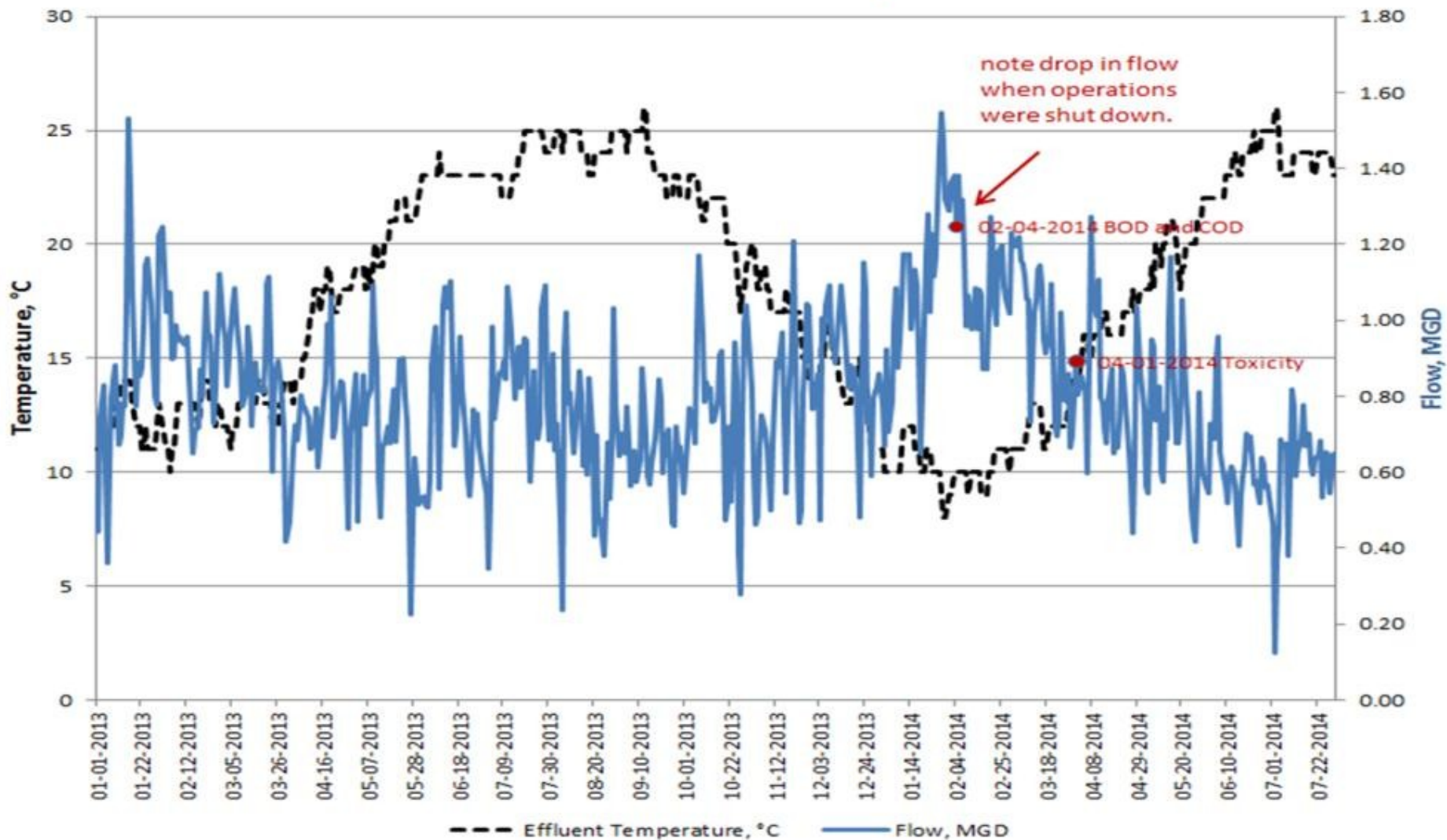




# NOV



## Outfall 029 Flow and Temperature





# Warning Letters



**Warning Letter:** 16 June 2014 – Warning letter for self reported event. Flash suppressant from tenant was burned as a Group 15 Waste at the Explosive Waste Incinerator under operator assumption that it was a mixture of gunpowder and flash suppressant as normal. The container was pure flash suppressant and generated a high ash content.

**Resolution:** Retrained area personnel, tenant personnel, and operators regarding waste characterization procedures

**Warning Letter:** 14 October 2014 – Warning letter for self reported first half of 2014 Semi Annual Monitoring Report Deviations at the

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# PERMIT APPLICATIONS



- Explosive Waste Incinerator – Permit application submitted in April 2012. Resolve Notice of Deficiency (NOD) with DEQ by the end of 2015.
- Open Burning Grounds – Permit application to be submitted by 31 March 2015.
- VAPDES Wastewater Discharge Permit – Application submitted to the DEQ 19 November 2014. Permit expiration date is 9 June 2015.







# NOD



**Notice of Deficiency:** Notice of Deficiency (NOD), Hazardous Waste Permit.

The Part B permit application for the renewal of Hazardous Waste Subpart O Explosive Waste Incinerator at Radford was submitted to the DEQ on 16 April 2012. On 7 October 2014 BAE Systems received a letter indicating that additional information is needed for VADEQ to process the permit.

Meetings will continue with the VADEQ to discuss the NOD, to resolve outstanding issues, and to provide additional information.

Additional NODs may be issued throughout the discussion process. These exchanges are public and available on the VADEQ website, Radford AAP section.

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# Steps in the Hazardous Waste Permit Reissuance Process

December 10, 2014



# DEQ Team

- Justin Williams, Director, Office of Waste Permitting & Compliance
- Leslie Romanchik, Hazardous Waste Program Manager
- Ashby Scott, Title V Coordinator
- Russ McAvoy, Environmental Engineer
- Ann Regn, Public Information Manager

[www.deq.virginia.gov](http://www.deq.virginia.gov)

# Hazardous Waste Management Permit

- Helps ensure the safe treatment, storage & disposal of hazardous waste
- Based on applicable regulatory requirements developed by EPA to protect people & the environment
- Establishes specific requirements that must be followed
- Outlines facility design and operation; includes emergency plans, employee training requirements as well as monitoring and reporting requirements.
- Also includes unit specific requirements (e.g., requirements for incinerators)

# Step 1: Starting the Renewal Process

- DEQ sends “call-in” letter 12 months before permit expiration.
- Facility submits application and fee.
- If timely, current permit conditions remain in effect.

## **Step 2: Receipt and Review of the Application**

- Review for completeness within 30 days of receipt of the application.
- Technical review of the application follows.
- Completeness and technical reviews may be combined.

# Step 3: Revisions

- After each review, DEQ may issue a Notice of Deficiency (NOD).
- NODs identify missing information.
- DEQ may issue several NODs until the application is complete.
- Reviews may take one to two years or more.

## Step 4: Drafting the Permit for Public Review

- After reviews, draft permit is prepared.
- Public notified by mailing, notice in local paper and on radio.
- Public has 45 days to comment on proposed permit.
- Citizens may request public hearing by contacting DEQ.

## Step 5: Final Permit Decision

- All public comments are considered, and DEQ must issue a "response to public comments."
- Changes to the draft permit may be warranted before the final permit is issued.



# How Can the Public Participate?

- Citizens can engage applicants and regulators in a dialogue.
- Applicant may also create informal opportunities for public input.
- Permitting process gives citizens several opportunities to express ideas and concerns.

# How Can the Public Participate?

- For the Radford Army Ammunition Plant, here are several steps you can take to ensure that your voice is heard:
  - Bookmark the Radford Army Ammunition Plant page on the DEQ website.  
[www.deq.virginia.gov](http://www.deq.virginia.gov)
  - Know whom to call at DEQ.



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Radford

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Virginia Department of  
Environmental Quality

P.O. Box 1105

## Radford Army Ammunition Plant

The Radford Army Ammunition Plant, located in Radford, Virginia, produces rocket and gun propellants. The plant was built in the 1940s by Hercules Powder Company to support military ammunition requirements during World War II. Today, the plant is the only active military propellant manufacturing center in the country. As a manufacturing facility, the plant is subject to the requirements of federal and state environmental statutes and regulations. This provides general information about the purpose and scope of the regulatory programs to better inform citizen stakeholders.

### Air Protection Programs

DEQ is authorized to oversee the [air permitting](#) program in Virginia. To ensure that emissions do not harm Virginia's [air quality](#) or negatively impact public health, the agency develops permits that uphold the provisions specified by the [Clean Air Act](#) (CAA). State and federal law requires these permits to be issued to those industries and facilities that consistently emit

## Featured Topics

- [DEQ NOD](#) issued October 7, 2014
- [Calendar](#) of pending regulatory actions
- [DEQ Aug 2014 letter](#) regarding reissuance of OBG permit
- [OB/OD fact sheet](#) and [diagram](#)
- [Waste incinerator fact sheet](#) and [diagram](#)
- [Post-closure Care fact sheet](#) for HW Units 5 & 16
- Public comment period for [ATSDR](#) health consultation closed
- [DEQ fact sheet](#) pertaining to general environmental

# How Can the Public Participate?

- Ask to be put on the facility mailing list for notices, fact sheets and other documents.
- Sign up for DEQ's RSS news feed, and receive updates on permit renewal application status and progress.
- Review permit materials as they become available on the RAAP web page.

Stay connected--[sign up for News Feeds](#) to receive email notices from DEQ.  
Or sign up at Virginia Regulatory [Town Hall](#) for Public Notices.

This facility is located within the DEQ [Blue Ridge Regional Office \(BRRO\)](#).

## Calendar

Activity	Date	More Information
Facility response to DEQ's Notice of Deficiency (NOD) is due for HW Incinerator permit renewal <a href="#">application</a> . See <a href="#">Nov. 5 letter</a> for extension details.	Due February 5, 2015	<a href="#">Ashby Scott</a>
Quarterly <a href="#">community meeting</a> hosted by BAE Systems at NRV Business Center	December 10, 2014	<a href="#">BAE Systems</a>
<a href="#">BAE request</a> to burn waste from tenant (Grucci) approved <a href="#">per email</a> by DEQ	December 4, 2014	<a href="#">Russ McAvoy</a>
Reissued Hazardous Waste Management <a href="#">Post-Closure Care Permit</a> for Hazardous Waste Management Units 5 & 16.	Effective August 16, 2014	<a href="#">Response to Comments</a>

# How Can the Public Participate?

- Submit written comments that are clear and well -documented.
- To ensure the effectiveness of comments, relate them to specific information in the proposed permit.
- Participate in public hearings and other meetings.
- If you need to clear up some details about the facility or the permitting process, email DEQ or BAE Systems.

Schedule of Actions	Date Completed
<b>Application for HWI submitted</b>	April 16, 2012
DEQ Initial Completeness Review (1st CR) sent to BAE	October 7, 2014
BAE request for 90 day extension for 1 <sup>st</sup> CR response	October 2014
Completeness Reviews	TBD
Technical Reviews	TBD
If deemed technically complete, draft permit and fact sheet prepared	TBD
Public notice published in newspaper	TBD
Public comment period	TBD
Public hearing	TBD
Final permit determination, response to comments sent	TBD



# Contact Information

Email:

- Justin.Williams@deq.virginia.gov
- Leslie.Romanchik@deq.virginia.gov
- Ashby.Scott@deq.virginia.gov
- Russ McAvoy@deq.virginia.gov
- Ann.Regan@deq.virginia.gov

Phone: 804-698-4000

Web: [www.deq.virginia.gov](http://www.deq.virginia.gov)



# QUESTIONS



Thank you! Our commitment to taking your questions doesn't end tonight. Let us know what you think:

## Resources

[RadfordInfo@baesystems.com](mailto:RadfordInfo@baesystems.com)

Public Affairs Officer  
US Army  
540.731.5785  
[www.rfaap.army.mil](http://www.rfaap.army.mil)

**Alicia Gray**  
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